

AVANTech LLC (Rob Hastings)

Comments on Class 3 Permit Modification Request 24590-BOF-PCN-ENV-26-004 for the Waste Treatment and Immobilization Plant, Operating Unit Group 10

1. Section III.10.C.3.e.ii, lines 22-33, (page 27 of 780, Conditions 16) – There are several conditions/ requirements for analyzing each batch for WTP during the DFLAW configuration. Should batch analysis requirements be stated for grout treatment with offsite disposal or is it assumed that waste sampling and analysis requirements for WTP satisfy grout treatment requirements?
2. Section III.M, line 31, (page 338 of 780, Conditions 327) – The description in the first paragraph of this section should be changed to reflect that grout treatment could be performed either off-site or at an on-site facility. This change provides alignment with the description of the Proposed Action in Section 1.2 of the Supplement Analysis (SA) of the Final Tank Closure and Waste Management EIS for the Hanford Site – Management of Pretreated Tank Waste from Tank AP-106 (DOE/EIS-0391-SA-06, July 2026). The wording change also provides alignment with the Proposed Action in the 200W Tank Waste Treatment SA (DOE/EIS-0391-SA-05, October 2025). Suggested wording in the last sentence: "... loading into tanker trucks (or other DOT approved shipping containers) for shipment to an alternate facility for grout treatment with disposal outside Washington state."
3. Section III.10.M.3.e.ii.A, line 9, (page 341 of 780, Conditions 330) – Recommend the word "off-site" be changed to "alternate" with the remainder of the sentence unchanged. Making this change reflects that grout treatment could occur either on-site or off-site consistent with DOE's Proposed Action.
4. Section III.10.M.3.e.ii.C, lines 19-22, (page 341 of 780, Conditions 330) – It is unclear what volume could be stored while remaining within a one year storage requirement. For example, could it be interpreted that 1,200,000 gallons could be stored in 300 DOT-approved containers?
5. Dangerous Waste Permit Application Part A Form, Section XI, second paragraph (page 365 of 780) – Same comment as provided in Section III.10.M.3.e.ii.A. The treatment facility description should be expanded to include a potential on-site treatment facility. Possible wording: "...and shipped to an alternate treatment facility with disposal off-site."
6. Chapter 3A, Section 3.0, Waste Analysis Plan, line 14, (page 386 of 780) – Same as other comments regarding potential on-site treatment. Possible wording: "...for shipment to an alternate treatment facility with disposal off-site."
7. Chapter 3B, Section 3B.2, lines 32-33, (page 396 of 780) – Same as other comments regarding potential on-site treatment. Possible wording: "...for shipment to an alternate treatment facility with disposal off-site."
8. Chapter 3B, Section 3B.3, lines 6-31, (page 397 of 780) – In the DFLAW configuration, selected organic compounds are not included in the waste characterization parameters. Should selected organic compounds be included for waste that will not be treated via vitrification?
9. Chapter 3B, Table 3B-2, Analytical Method Requirements for Tank Waste Acceptance Samples (page 408 of 780) – Shouldn't limits be provided for the organics for alternate treatment?
10. Chapter 3C, Section 3C.2, lines 33-36, (page 418 of 780) – Same comment as previously provided. The treatment facility description should be expanded to include both on-site and off-site grout treatment facilities.
11. Chapter 3C, Section 3C.5, lines 9-18, (page 423 of 780) – Same comment as previously provided. The treatment facility description should be expanded to include a potential on-site

treatment facility.

12. Chapter 3C, Section 3C.5.3, Table 3C-5, (page 428 of 780) – Same comment as previously provided. The treatment facility description should be expanded to include a potential on-site treatment facility.

13. Chapter 3C, Section 3C.5.4, lines 17-24, (page 431 of 780) – Similar to the site-specific LDR treatment variance approved for WTP, plans were made to submit an LDR treatment variance petition to provide a site-specific technology-based LDR treatment standard, STABL, for the pretreated waste that will be grout stabilized. For clarity, it would be good to add a brief paragraph describing what is planned.

14. Chapter 4.0, (pages 448 through 597) - Same comment as previously provided. The treatment facility description should be expanded to include both on-site and off-site grout treatment facilities. Specific locations are as follows:

a. Section 4.1, lines 1-3, (page 447 of 780)

b. Section 4.1.1, lines 5-7 and lines 35-39, (page 448 of 780)

c. Section 4.G, lines 7, 11-12, and 28, (page 590 of 780)

d. Section 4.G, lines 12 and 18, (page 591 of 780)

e. Section 4.G.2.1, lines 29 and 41-42, (page 593 of 780)

f. Section 4.G.2.8, lines 5-6, (page 597 of 780)

15. Building Emergency Plan, Section 1.5, Page 10, (page 661 of 780) – Same comment as previously provided. The treatment facility description should be expanded to include both on-site and off-site grout treatment facilities.

16. 24590-BOF-PER-J-16,001, System Logic Description for the DFLAW EMF Process System, Section 3.3.1, Page 14, (page 749 of 780) – Same comment as previously provided. The treatment facility description should be expanded to include both on-site and off-site grout treatment facilities.

17. Dangerous Waste Permit Application Part A Form, Section XI, second paragraph (page 767 of 780) – Same comment as provided in other sections. The treatment facility description should be expanded to include both on-site and off-site grout treatment facilities.

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